

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

MIDSHIP PIPELINE COMPANY, LLC,)	
Plaintiff,)	
)	
vs.)	Case No. 6:18-CV-302-RAW
)	The Honorable Ronald A. White
TRACT NO. BR-0860.000, 2.331)	
ACRES OF LAND, MORE OR LESS,)	
PERMANENT EASEMENT (PIPELINE))	
RIGHT OF WAY) IN BRYAN COUNTY,)	
OKLAHOMA, <i>et al.</i> ,)	
Defendants.)	

MOTION TO WITHDRAW

COME NOW Harlan Hentges of the firm of Hentges & Associates, PLLC (“Hentges”) and James Randall Miller (“Miller”) and request this Court approve their withdrawal as counsel for Central Land Consulting, LLC (“Central Land”) and the individual land owners for whom Hentges and Miller, at Central Land’s request entered their appearance (Central Landowners)(see Exhibit “1”) in the above-referenced matter affiliated with Central (*See* docket entries 676 and 681).

In support of this motion, counsel would show that Central Land hired Hentges to serve as counsel in this matter for and on behalf of Central Land and the Central’s Landowners. The withdrawal is in the best interest of the clients for the reasons that scope of the representation and the amount of the resources required to pursue the matter has exceed the limited the resources of individual practitioners, Hentges and Miller. The under-signed counsel believe this lack of needed resources, including man-power, is an unsurmountable disadvantage to the clients, and that it is in the best interest of the Central

Land and Central Landowners to obtain counsel with the man power and other law firm resources necessary to effectively manage and fully advance the interests of Central L and the Central Landowner in this matter and corollary matter that may and have arisen. These concerns have been discussed in detail and at length with Central Land and Central Land's Ohio counsel. Those discussion have not result in a resolution of the concerns expressed by Hentges and Miller.

On October 21, 2019, Hentges notified Central Land and the Central Landowners that it was necessary, for the reasons stated above to terminate his relationship with Central Land and the Central Land Defendants and advised them to seek separate counsel. Central Land through its Ohio counsel has advised it is seeking replacement counsel to serve on its behalf and on behalf of the Central Landowners. Movants have not yet been advised whether Central Land or the Central Landowners will oppose the Motion to Withdraw.

Movants certify that this Motion to Withdraw will be served via U.S Mail on Central Land and the Central Landowners.

WHEREFORE, movants pray this Court approve the withdrawal of Harlan Hentges of Harlan Hentges, PLLC, and James Randall Miller as counsel for Central Land Consulting, LLC and the Central Land Defendants and these proceedings be stayed for a period of thirty (30) days to permit replacement counsel to enter an appearance in this matter.

s/ Harlan Hentges
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-and-

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CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2019, the foregoing *Motion to Withdraw* has been filed and electronically served upon all counsel of record.

s/Harlan Hentges
Harlan Hentges